

FILED

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

APR - 4 2007

CLERK  
U. S. DISTRICT COURT  
MIDDLE DIST. OF ALA.

UNITED STATES OF AMERICA )

v. )

JAMES LASSIC, JR.  
ANDRE SAQUAN LASSIC )

CR. NO. 2:07-CR-75-MEF

[18 U.S.C. §§ 641 and 2]

INDICTMENT

The Grand Jury charges:

INTRODUCTION

1. At all times relevant to this Indictment James Lassic, Jr. lived at 5332 Ira Lane in Montgomery, Alabama with his family, including his Daughter. A Neighbor of the Lassics' lived at 5331 Lola Lane, also in Montgomery, Alabama.

2. From on or about May 18, 2005, until on or about October 14, 2005, James's son, Andre Saquan Lassic, was in the custody of the Montgomery, Alabama County Jail. At all other times relevant to this Indictment, Andre was a resident of Montgomery, Alabama.

3. On or about September 29, 2005, two application were filed with the Federal Emergency Management Agency ("FEMA"), an agency within the United States Department of Homeland Security, for benefits in connection with Hurricane Katrina, in the names of James Lassic and in the name of his Daughter. These application falsely represented that James and Daughter had suffered losses to primary residences in Harvey, Louisiana. In fact, James and Daughter did not reside in Louisiana and did not suffer the losses claimed.

4. FEMA accepted the applications and caused two United States Treasury checks, each in the amount of \$1,352, to be mailed to James and Daughter at Neighbor's address in Montgomery, Alabama. Federal agents, however, intercepted the checks before they were cashed.

5. On or about October 4, 2005, Neighbor, with the assistance of James, caused to be filed two applications with FEMA, for benefits in connection with Hurricane Rita, in the names of Andre and Daughter. Again, these applications falsely represented that Andre and Daughter had suffered losses to a property in Harvey, Louisiana. In fact, Andre and Daughter did not reside in Louisiana and did not suffer the losses claimed.

6. FEMA accepted the applications and caused two United States Treasury checks, each in the amount of \$2,000, to be mailed to Andre and Daughter at Neighbor's address in Montgomery, Alabama.

7. Andre received the check in his name and cashed it. He gave \$500 of the cashed check to James. Daughter collected the check in her name with the assistance of James. She later cashed it.

#### **COUNT 1**

8. On or about the date set forth below, in Montgomery County, within the Middle District of Alabama, and elsewhere, the defendants

**JAMES LASSIC, JR. and  
ANDRE SAQUAN LASSIC,**

did, while aiding and abetting and while being aided and abetted by Neighbor and other persons both known and unknown to the Grand Jury, embezzle, steal, purloin, and knowingly convert to their own use money and things of value of the United States and of a department and agency thereof, in an amount in excess of \$1,000, and did receive, conceal, and retain the same with the intent to convert it to their use and gain, knowing it to have been embezzled, stolen, purloined and converted as described below:

<b>DATE</b>	<b>ITEM</b>
October 17, 2005	FEMA disaster assistance funds in the amount of \$2,000, check number 222174315278.

All in violation of Title 18, United States Code, Sections 641 and 2.

**COUNT 2**

9. On or about the date set forth below, in Montgomery County, within the Middle District of Alabama, and elsewhere, the defendant

**JAMES LASSIC, JR.,**

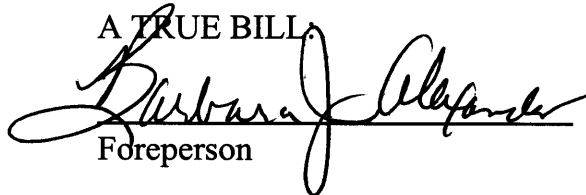
did, while aiding and abetting and while being aided and abetted by Neighbor, Daughter, and other persons both known and unknown to the Grand Jury, embezzle, steal, purloin, and knowingly convert to his own use and the use of others, money and things of value of the United States and of a department and agency thereof, in an amount in excess of \$1,000, and did receive, conceal, and retain the same with the intent to convert it to his

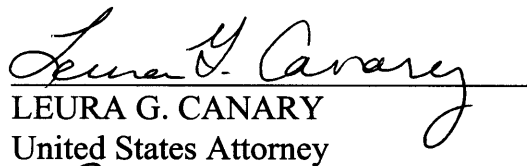
use and gain and the use and gain of others, knowing it to have been embezzled, stolen, purloined and converted as described below:

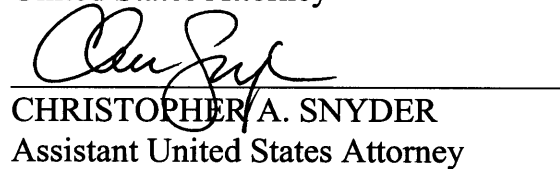
DATE	ITEM
November 8, 2005	FEMA disaster assistance funds in the amount of \$2,000, check number 222174315178.

All in violation of Title 18, United States Code, Sections 641 and 2.

A TRUE BILL

  
Foreperson

  
LEURA G. CANARY  
United States Attorney

  
CHRISTOPHER A. SNYDER  
Assistant United States Attorney